

# Exhibit I

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7 **LYNBERG & WATKINS**

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10 Attorneys for Defendant, COUNTY OF SAN BERNARDINO,  
11 ROBERT VACCARI, and JAKE ADAMS

12

13 **UNITED STATES DISTRICT COURT**  
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 L.C., a minor by and through her  
16 guardian *ad litem* Maria Cadena,  
17 individually and as successor-in-interest  
18 to Hector Puga; I.H., a minor by and  
through his guardian *ad litem* Jasmine  
Hernandez, individually and as  
successor-in-interest to Hector Puga;  
A.L., a minor by and through her  
guardian *ad litem* Lydia Lopez,  
individually and as successor-in-interest  
to Hector Puga; and ANTONIA  
19 SALAS UBALDO, individually,

Plaintiffs,

20 vs.

21 STATE OF CALIFORNIA; COUNTY  
22 OF SAN BERNARDINO; S.S.C., a  
nominal defendant; ISAIAH KEE;  
MICHAEL BLACKWOOD;  
23 BERNARDO RUBALCAVA;  
ROBERT VACCARI; JAKE ADAMS;  
24 and DOES 6-10, inclusive,

25 Defendants.

26 CASE NO. 5:22-cv-00949-KK-(SHKx)

27 *Assigned for All Purposes to:  
Hon. Kenly K. Kato—Courtroom 1*

28 **DEFENDANTS COUNTY OF SAN  
BERNARDINO, ROBERT  
VACCARI and JAKE ADAMS'  
FOURTH SUPPLEMENTAL  
DISCLOSURES PURSUANT TO  
FED. R. CIV. P. 26**

*Trial Date: June 2, 2025*

*Complaint filed: June 7, 2022  
FAC filed: October 18, 2022  
SAC filed: January 13, 2023  
TAC filed: May 12, 2023*

1 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

2 Pursuant to Federal Rules of Civil Procedure 26 and Local Rule 26-1,  
3 Defendants COUNTY OF SAN BERNARDINO, ROBERT VACCARI, and JAKE  
4 ADAMS (“County Defendants”) hereby make the following initial disclosures,  
5 based on information presently available:

6 **II. DOCUMENTS DEFENDANT COUNTY MAY USE TO  
7 SUPPORT DEFENSE(S)**

8 Without waiving their rights, including but not limited to their right under the  
9 attorney-client privilege and work product doctrine, as well as right to privacy, and  
10 any privileges afforded Defendant, Defendant identifies the following documents or  
11 categories of documents they may use in support of their defenses:

12 29. GoFundMe: Fundraiser by Gabriela Salas Help for funeral for Hector J.  
13 Puga, bate stamped *COSB009498-COSB009510*.  
14 30. Facebook Profile – Puga, bate stamped *COSB009511-COSB009557*.  
15 31. Restraining Order Documents re Maria R. Cadena 03/07/13, Case  
16 #NQ018271, bate stamped *COSB009558-COSB009577*.  
17 32. Request Order Documents re Maria R. Cadena 01/25/13, Case  
18 #NQ018271, bate stamped *COSB009578-COSB009587*.  
19 33. Case Summary re Restraining Order re Maria Cadena, Case #NQ018271,  
20 bate stamped *COSB009588-COSB00958*.  
21 34. Case Summary re Restraining Order re Yobana Puga, Case #BQ047632,  
22 bate stamped *COSB009590-COSB009593*.  
23 35. Case Summary re Restraining Order re Yobana Puga, Case #BQ045673,  
24 bate stamped *COSB009594-COSB009595*.  
25 36. Emergency Protective Order re Linda Rangel 01/29/19, Case #T-1900506,  
26 bate stamped *COSB009596*.

1       37. Restraining Order Documents re Yobana Puga and child 02/04/15, Case  
2                    #BQ047632, bate stamped *COSB009614-COSB009631*.  
3       38. Restraining Order Documents re Yobana Puga and child 08/21/14, Case  
4                    #BQ045673, bate stamped *COSB009597-COSB009613*.

5  
6       DATED: January 14, 2025

**LYNBERG & WATKINS**  
A Professional Corporation

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9  
10      By: */s/ Amy R. Margolies* \_\_\_\_\_  
11           SHANNON L. GUSTAFSON  
12           AMY R. MARGOLIES  
13           ANITA K. CLARKE  
14           Attorneys for Defendant,  
15           COUNTY OF SAN BERNARDINO  
16           ROBERT VACCARI, and JAKE ADAMS

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**DEFENDANTS COUNTY OF SAN BERNARDINO, ROBERT VACCARI  
and JAKE ADAMS' FOURTH SUPPLEMENTAL DISCLOSURES  
PURSUANT TO FED. R. CIV. P. 26**

## PROOF OF SERVICE

**STATE OF CALIFORNIA, COUNTY OF ORANGE**

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 1100 Town & Country Road, Suite #1450, Orange, California 92868.

On January 14, 2025, I served the foregoing document(s) described as  
**DEFENDANT COUNTY OF SAN BERNARDINO ROBERT VACCARI**  
**AND JAKE ADAMS FOURTH SUPPLEMENTAL DISCLOSURES**  
**PURSUANT TO FED. R. CIV. P. 26** on the interested parties by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

*REFER TO ATTACHED SERVICE LIST*

- BY MAIL:** As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, I deposited such envelope in the mail at Orange, California.
- VIA ELECTRONIC MAIL (CM/ECF)** - all parties listed above have been served via electronic mail through the court's CM/ECF system, which automatically generates a Notice of Electronic Filing (NEF) allowing registered e-filers to retrieve the document.
- BY FEDERAL EXPRESS/OVERNIGHT MAIL:** I caused the above-described document to be served on the interested parties noted as follows by Federal Express/OVERNIGHT Mail.
- BY ELECTRONIC MAIL:** I caused all of the pages of the above-entitled document to be sent to the recipient(s) noted at the respective email address(es) indicated.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made. I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on January 14, 2025 at Orange, California.

/s/ Gloria Pence  
Gloria Pence

**1** **SERVICE LIST**

**2** Dale K. Galipo, Esq. Attorney for Plaintiffs,  
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**7** Litigation Secretary

**8**

**9** Diana Esquivel Attorney for Defendants  
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**10** TORT & CONDEMNATION through California Highway Patrol and  
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